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June 14, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: MM Docket No. 93-106
ITFS Channel Loading

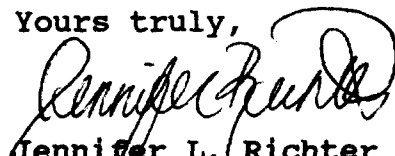
Dear Ms. Searcy:

North American Catholic Educational Programming Foundation, Inc. ("NACEPF"), through counsel, hereby files an original and four copies of these brief comments in the above-captioned docket.

In regards to the proposed rule making on single channel loading, NACEPF supports the position that any rule making must safeguard the right of the ITFS licensee to absolute unrestricted recapture of all four ITFS channels, upon reasonable notice to the wireless cable operator, at no cost or penalty to the ITFS licensee. This ready recapture right must be protected in such a manner that it cannot be negotiated away.

Although NACEPF was a party to the original Spokane, WA (Skyline Entertainment Network) request for rule waiver to allow single channel loading, this was done to accommodate the wireless operator in a specific instance and in no way are NACEPF's rights to broadcast on all four channels diminished in its contract.

Yours truly,


Jennifer L. Richter
Counsel for North American
Catholic Educational Programming
Foundation, Inc.

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